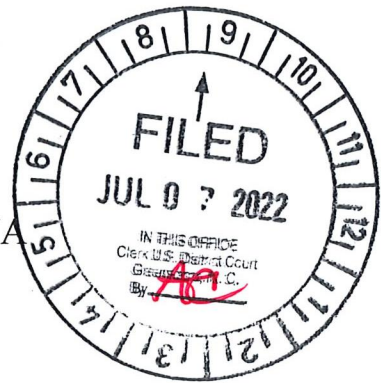


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



TAMMY MCCRAE-COLEY,)

Plaintiff,)

) 1:21 – CV - 00666

V.)

Initial Disclosures

STARTER HOMES PROGRAMS)

INC., et al.,)

Defendants.)

This document is submitted pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) during ongoing litigation based on information currently available to Plaintiff at this time and the Plaintiff reserves the right to modify as the case develops.

Discoverable Information

1. Xanadu, Starter Home Investing and Starter Homes Programs

Joe Delfgauw – President of Defendants

Overall knowledge of Defendants operation
Overall knowledge of other Defendants
Alleged opt-in information

Edward Winkler - Defendants' General Counsel

Overall knowledge of Defendants operation
Knowledge of previous communications
Alleged opt-in information

Corporate Custodians of records (names unknown) - (Xanadu, Starter Home Investing and Starter Homes Programs - including employees of texting company)

Texting and calling information/software
Alleged opt-in information

Corporate Employee(s) of the call center (renttoownhomefinders.com)

Information concerning call(s) to Plaintiff.

Seller(s) of Plaintiff's Information/Lead details

Owner and custodian of records of www.mommiessavingsclub.com – Information concerning the website and the websites referenced on the site.

2. Nations Info Corp and Yourrent2own.com

Tim Chin CEO (Nations Info Corp and Yourrent2own.com)

Overall knowledge of operations, Knowledge of lead history and Relationship between the parties.

Corporate Custodians of records (names unknown) - (Nations Info Corp and Yourrent2own.com)

Texting and calling information and detail

Alleged opt-in information

Seller(s) of Plaintiff's Information/Lead details of capture of the alleged consent.

Potential Damages:

Federal -	TCPA	(8 text and 1 call) = 9 calls	DNC \$500-\$1500 each
	Auto dialer	(8 text and 1 call) = 9 calls	ATDS \$500-\$1500 each
State -	1 st call	\$500.00	
	2 nd call	\$1000.00	
	3 rd – 9 th call	\$5000.00 each	

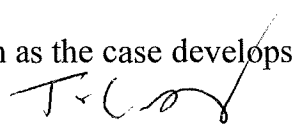
With possible Treble damages on state damages

Insurance: Not Applicable

Witnesses: No witnesses identified at this time

The Plaintiff reserves the right to modify this information as the case develops.

This 5th day of July, 2022.


Tammy McCrae-Coley
TammyColeyjd@gmail.com
1400 Battleground Ave.
Suite 116-L
Greensboro, NC 27408
336-491-316

CERTIFICATE OF SERVICE

This is to certify that the undersigned Plaintiff has this day served the foregoing **INITIAL DISCLOSURES** on STARTER HOME PROGRAMS INC. dba RENTOOWNHOMEFINDER.COM, STARTER HOME INVESTING INC. dba RENTOOWNHOMEFINDER.COM, STARTER HOME PROGRAMS INC. dba LENDING CLOUD HOMES, STARTER HOME INVESTING INC. dba LENDING CLOUD HOMES, NATIONS INFO CORPORATION dba CREDITREVIEW.CO, NATIONS INFO CORPORATION dba YOURCREDITSCOREANDMORE.COM, RENT TO OWN CORP. dba Yourrent2own.com, XANADU MARKETING, INC individually (Assumed Name APEX PAGE BUILDER), and dba CLOUDBASEDPERSONALLOANS.COM and XANADUTRACKING.COM, and INSURANCE-REVIEWED.COM By depositing a copy hereof, via regular mail, postage paid addressed to the following:

Attorney B. Tyler Brooks
Starter Home Programs, Inc.
dba Renttoownhomefinders.com
P.O. Box 10767
Greensboro, NC 27407

Attorney B. Tyler Brooks
Starter Home Programs, Inc.
dba Lending Cloud Homes
P.O. Box 10767
Greensboro, NC 27407

Attorney B. Tyler Brooks
Starter Home Investing, Inc.
dba Renttoownhomefinders.com
P.O. Box 10767
Greensboro, NC 27407

Attorney B. Tyler Brooks
Starter Home Investing, Inc.
dba Lending Cloud Homes
P.O. Box 10767
Greensboro, NC 27407

Attorney B. Tyler Brooks
Xanadu Marketing, Inc.
dba Apex Page Builder
P.O. Box 10767
Greensboro, NC 27407

Attorney B. Tyler Brooks
Xanadu Marketing, Inc.
dba Cloudbasedpersonalloans.com
P.O. Box 10767
Greensboro, NC 27407

Attorney B. Tyler Brooks
Xanadu Marketing, Inc
dba XanaduTracking.com
P.O. Box 10767

Greensboro, NC 27407

Attorney B. Tyler Brooks
Xanadu Marketing, Inc.
P.O. Box 10767
Greensboro, NC 27407

William M. Butler
Mark A. Nebrig
Get Rent To Own Corp
dba Yourrent2own.com
MOORE & VAN ALLEN, PLLC
100 North Tryon Street, Floor 47
Charlotte, NC 28201-4003


Attorney B. Tyler Brooks
Insurance-Reviewed.com
P.O. Box 10767
Greensboro, NC 27407

William M. Butler
Mark A. Nebrig
Nations Info Corporation
dba Yourscoreandmore.com
MOORE & VAN ALLEN, PLLC
100 North Tryon Street, Floor 47
Charlotte, NC 28201-4003

William M. Butler
Mark A. Nebrig
Nations Info Corporation
dba Creditreview.co
MOORE & VAN ALLEN, PLLC
100 North Tryon Street, Floor 47
Charlotte, NC 28201-4003

Sean M. Sullivan
DAVIS WRIGHT TREMAINE LLP
865 South Figueroa Street, 24th Floor
Los Angeles, CA 90017 – 2566

This ^{7th} ~~5~~th day of July, 2022.


Tammy McCrae-Coley
TammyColeyjd@gmail.com
1400 Battleground Ave.
Suite 116 – L
Greensboro, NC 27408
336-491-3163